

1 ARMENDAREZ discussed the distribution of narcotics with an
2 undercover law enforcement officer, and defendant R. LOZANO
3 discussed arrangements to pay the undercover officer for a
4 narcotics transaction conducted with the president of the Mongols
5 Okane Park chapter.

6 314. On January 26, 2008, by telephone using coded
7 language, defendant WILSON advised defendant CAVAZOS that a
8 Mongols member had been forced to surrender his motorcycle to the
9 gang.

10 315. On January 28, 2008, defendant R. LOZANO arranged to
11 purchase one half-pound of methamphetamine from an undercover law
12 enforcement officer at the "Laugh Factory" in Hollywood,
13 California.

14 316. On February 1, 2008, defendant NIEVES threatened to
15 shoot rival gang members at the "Katie Jakes" bar in Covina,
16 California.

17 317. On February 2, 2008, in Los Angeles, California,
18 defendant J. GARCIA advised an undercover law enforcement
19 officer, posing as a Mongols "prospect," that he should not
20 display Mongols emblems in Cypress Park because of ongoing
21 conflicts with the Mexican Mafia, and J. GARCIA offered to sell a
22 Tech-9 assault weapon to the undercover officer.

23 318. On February 3, 2008, by telephone using coded
24 language, defendant WILSON told defendant H. GONZALEZ that
25 defendant R. CAVAZOS, JR., had required that all Mongols
26 applications include serial numbers.

27 319. On February 4, 2008, by telephone using coded
28 language, an unindicted co-conspirator warned defendant MUNZ that

1 law enforcement officers were looking for MUNZ and another
2 Mongols member in connection with the investigation of the murder
3 of "Hells Angels" gang member C.T., and the co-conspirator
4 advised MUNZ that he told officers that MUNZ did not live at the
5 location.

6 320. On February 4, 2008, by telephone using coded
7 language, defendant MUNZ advised defendant CHEVILLE that law
8 enforcement officers were looking for him and an unindicted co-
9 conspirator at the residence of defendant SHAWLEY in connection
10 with the investigation of the murder of C.T. and that CHEVILLE
11 and others needed to remove evidence of their crimes from their
12 residences.

13 321. On February 5, 2008, by telephone using coded
14 language, defendants CAVAZOS and MUNZ discussed the Mongols'
15 conflicts with the Mexican Mafia based on the Mongols' refusal to
16 pay "taxes" to "La Eme" for their narcotics trafficking and the
17 consequences of Mongols members entering protective custody while
18 in prison.

19 322. On February 8, 2008, by telephone using coded
20 language, defendants WILSON and BUSS discussed plans to seize
21 control of the Mongols from defendant CAVAZOS.

22 323. On February 9, 2008, defendants CAVAZOS, R. CAVAZOS,
23 JR., and A. CAVAZOS, JR., possessed firearms and bullet-proof
24 vests at their residence in West Covina, California.

25 324. On February 9, 2008, defendant NIEVES and an
26 unindicted co-conspirator armed themselves for a confrontation
27 with rival gang members at the "Around the Corner" bar in West
28 Covina, California.

1 325. On February 10, 2008, in Los Angeles, California,
2 defendant J. GARCIA advised three undercover law enforcement
3 officers that they had been approved as "full patch" members of
4 the Mongols.

5 326. On February 11, 2008, defendant MUNZ directed Mongols
6 associates to attack rival "Hells Angels" gang members at the
7 "Parkway Bowl" in El Cajon, California, and admonished the
8 victims that they were in Mongols territory.

9 327. On February 12, 2008, defendants R. LOZANO and RIVERA
10 delivered approximately 97 grams of actual methamphetamine to an
11 undercover law enforcement officer at a "Target" store in
12 Rosemead, California, and R. LOZANO advised the officer that R.
13 LOZANO, RIVERA and defendant A. LOZANO could provide armed
14 protection for another narcotics transaction involving 20 to 30
15 kilograms of cocaine.

16 328. On February 14, 2008, by telephone, defendants CAVAZOS
17 and R. CAVAZOS, JR., discussed obtaining a trademark on the
18 Mongols image.

19 329. On February 16, 2008, by telephone using coded
20 language, defendant MUNZ warned defendant CAVAZOS that a Mongols
21 associate might be providing information to law enforcement about
22 the crimes of the Mongols.

23 330. On February 17, 2008, in West Covina, California,
24 defendant R. CAVAZOS, JR., directed undercover law enforcement
25 officers, posing as Mongols "prospects," to store firearms in R.
26 CAVAZOS, JR.'s, car so that they would be readily accessible if
27 Mongols needed to use them, and defendants RODRIGUEZ and NIEVES
28 discussed retaliating against rival gang members who had shot at

1 NIEVES on February 1, 2008.

2 331. On February 20, 2008, defendants CAVAZOS, R. CAVAZOS,
3 JR., MUNZ, H. GONZALEZ, and J. GARCIA attended a Mongols
4 "Sergeant-At-Arms" meeting in El Monte, California, and CAVAZOS
5 advised members that a Mongols "prospect" was cooperating with
6 the government in the prosecution of defendant MALDONADO for the
7 April 8, 2007 shooting of Maravilla gang members, and CAVAZOS
8 also warned members about the possible infiltration of the
9 Mongols by undercover law enforcement officers.

10 332. On February 22, 2008, defendants H. GONZALEZ and
11 NIEVES attended a Mongols "mother chapter" meeting in El Monte,
12 California, and directed defendant ANGULO and an undercover law
13 enforcement officer to act as a security force outside the
14 meeting location.

15 333. On February 23, 2008, defendants CAVAZOS, R. CAVAZOS,
16 JR., NIEVES, and ANGULO carried firearms and attended the Mongols
17 Harbor chapter party in Wilmington, California, and defendant J.
18 GARCIA admitted three undercover law enforcement officers as
19 Mongols members.

20 334. On February 26, 2008, by telephone using coded
21 language, defendants CAVAZOS and MUNZ discussed plans to direct
22 defendant WILSON to confront the Mongols "Mother Chapter" over
23 allegations that he has been disloyal to the Mongols.

24 335. On February 26, 2008, in West Covina, California,
25 defendants CAVAZOS, MUNZ, GONZALES, and CANALES, and other
26 unindicted co-conspirators attended a Mongols "Mother Chapter"
27 meeting and addressed the expansion of the Mongols across the
28 United States and internationally.

1 336. On February 28, 2008, in Los Angeles, California,
2 defendants H. GONZALEZ and J. GARCIA collected dues from Mongols
3 members for the Mongols organization.

4 337. On February 29, 2008, in Los Angeles, California,
5 defendants H. GONZALEZ and ROSELI collected dues payments from
6 Mongols members for the Mongols organization.

7 338. On February 29, 2008, in Las Vegas, Nevada, defendant
8 TREVINO recruited an undercover law enforcement officer, who was
9 posing as a drug trafficker, to join the Mongols and told the
10 officer that his drug trafficking would benefit the Mongols,
11 although he would be expected to "go to war" for the Mongols and,
12 once a member of the Mongols, would not be permitted to quit the
13 organization.

14 339. On February 4, 2008, in Whittier, California,
15 unindicted Mongols threatened to assault an African-American
16 patron at "Steve's BBQ" if he did not leave the restaurant.

17 340. On March 6, 2008, by telephone using coded language,
18 defendant CAVAZOS directed defendant WILSON to remind Mongols
19 members that they must answer to the Mongols "Mother Chapter" and
20 specifically to CAVAZOS.

21 341. On March 9, 2008, in Las Vegas, Nevada, defendants
22 HULL and TREVINO encouraged an undercover law enforcement
23 officer, who was posing as a drug trafficker, to join the
24 Mongols, and HULL told the officer that he could make a lot of
25 money trafficking drugs with him.

26 342. On March 11, 2008, by telephone, defendant CAVAZOS
27 discussed preparing a story on the Mongols with a news reporter,
28 and CAVAZOS told the reporter that he could provide specific

1 details about a Mongols murder committed at a tattoo shop and
2 involving the Mexican Mafia, including information about the
3 planning and preparation for the murder.

4 343. On March 12, 2008, by telephone using coded language,
5 defendant CAVAZOS directed an unindicted Mongols member to
6 deliver Mongols dues payments to CAVAZOS at his residence in West
7 Covina, California.

8 344. On March 14, 2008, defendant BUSS directed an
9 unidentified Mongols member known as "Convict" to locate and
10 attack the owner of an art gallery in Pomona, California, and
11 "Convict" carried a .45 caliber handgun with him when he
12 attempted to carry out the attack.

13 345. On March 14, 2008, defendant TREVINO sold a firearm to
14 an undercover law enforcement officer and a confidential
15 government informant in Las Vegas, Nevada.

16 346. On March 17, 2008, defendants CAVAZOS, R. CAVAZOS,
17 JR., H. GONZALEZ, ROSELI, A. CAVAZOS, JR., MEDEL, and MCCUALEY
18 possessed a loaded .22 caliber rifle, a Sturm Ruger mini-thirty
19 rifle, a 12-gauge shotgun, .30 caliber rifle, two Taurus 9 mm
20 handguns, five .45 caliber handguns, a .223 caliber rifle, a
21 loaded 5.56 caliber rifle, and two .38 caliber revolvers for the
22 Mongols at their residence in West Covina, California.

23 347. On March 17, 2008, defendant CAVAZOS sent a telephone
24 message to Mongols chapters to warn Mongols that law enforcement
25 officers were searching his residence and they should prepare for
26 further law enforcement action.

27 348. On March 22, 2008, in San Diego County, defendant A.
28 LOZANO possessed two handguns.

1 349. On March 23, 2008, by telephone using coded language,
2 defendant ARMENDAREZ told defendant MUNZ that defendant A. LOZANO
3 had been arrested but that ARMENDAREZ and another Mongols member
4 were trying to post bail for A. LOZANO.

5 350. On March 23, 2008, by telephone using coded language,
6 defendant MUNZ told defendant CAVAZOS that defendant A. LOZANO
7 had been arrested.

8 351. On March 26, 2008, in Las Vegas, Nevada, defendants
9 TREVINO, HULL, and WILLIAM RAMIREZ armed themselves as "security"
10 to protect the distribution of 20 kilograms of cocaine.

11 352. On March 31, 2008, in Los Angeles, California,
12 defendant ROSELI issued an order to Mongols members to pay legal
13 defense funds to the Mongols "Mother Chapter."

14 353. On April 1, 2008, in El Monte, California, defendants
15 H. GONZALEZ and ROSELI collected cash from Mongols members for
16 the organization.

17 354. On April 1, 2008, in Montebello, California, defendant
18 FIGUEROA possessed approximately 97 grams of actual
19 methamphetamine and a loaded .45 caliber handgun.

20 355. On April 1, 2008, by telephone using coded language,
21 defendant CAVAZOS warned members that law enforcement officers
22 were conducting a "raid" on defendant FIGUEROA and that Mongols
23 should hide evidence of their crimes.

24 356. On April 6, 2008, defendants LOZA and NEWMAN stabbed
25 R. H. and beat J. H. at a Mobile gas station in Pasadena,
26 California.

27 357. On April 7, 2008, by telephone using coded language,
28 defendant CAVAZOS directed Mongols members to disguise their

1 membership in the enterprise following the April 6, 2008 attack
2 in Pasadena, California.

3 358. On April 10, 2008, defendant GUTIERREZ sold
4 approximately 107.1 grams of actual methamphetamine to an
5 undercover law enforcement officer and a confidential government
6 informant in Montebello, California.

7 359. On April 11, 2008, defendants ARMENDAREZ, R. LOZANO,
8 HULL, and RIVERA discussed arrangements to distribute
9 methamphetamine and cocaine with an undercover law enforcement
10 officer.

11 360. On April 12, 2008, defendants CAVAZOS, MUNZ and R.
12 CAVAZOS, JR., led a Mongols "All Members" meeting at the "House
13 Lounge" in Maywood, California, and CAVAZOS instructed Mongols
14 that they must protect one another against law enforcement and
15 would not be permitted to cooperate in an Internal Revenue
16 Service investigation of CAVAZOS.

17 361. On April 12, 2008, in Maywood, California, defendant
18 MUNZ addressed Mongols at an "all members" meeting and told them
19 that he believed defendant CAVAZOS was being investigated for
20 "terrorist recruitment," and defendant R. CAVAZOS, JR., directed
21 members to contribute to a fund for CAVAZOS' legal fees.

22 362. On April 14, 2008, defendant R. CAVAZOS, JR., met with
23 an undercover law enforcement officer, who was posing as a new
24 Mongols member, at the "Yard House" in Pasadena, California, and
25 R. CAVAZOS, JR., told the officer that the "Mother Chapter" would
26 preserve the "Mongol Nation" and ensure that information about
27 the Mongols' crimes did not reach law enforcement.

28 363. On April 17, 2008, in Los Angeles, California,

1 defendant J. GARCIA collected money from Mongols members to pay
2 for defendant CAVAZOS' legal defense.

3 364. On April 27, 2008, in Whittier, California, defendants
4 NAVA, COTTINI, and LOUIE stabbed N. G. when they suspected he was
5 a rival gang member.

6 365. On April 27, 2008, in Long Beach, California,
7 unidentified Mongols used knives to forcibly remove support
8 patches for the "Hells Angels" from patrons at the Long Beach
9 motorcycle swap meet.

10 366. On May 1, 2008, in Alhambra, California, defendants
11 ROSELI and J. GARCIA collected money from Mongols for the
12 enterprise.

13 367. On May 1, 2008, in Montebello, California, defendant
14 GUTIERREZ sold approximately 75.4 grams of actual methamphetamine
15 to an undercover law enforcement officer and a confidential
16 government informant.

17 368. On May 3, 2008, defendants CAVAZOS and R. CAVAZOS,
18 JR., collected dues payments from Mongols gang members at their
19 residence in West Covina, California, and R. CAVAZOS, JR.,
20 displayed a semi-automatic handgun as he collected payments from
21 Mongols.

22 369. On May 24, 2008, defendant MCCUALEY, with defendant R.
23 CAVAZOS, JR., and two other Mongols members, displayed a .45
24 caliber semi-automatic handgun, and threatened to kill D.Q. in
25 the parking lot of the "Ordonez" restaurant in Montebello,
26 California, threatening, "We are going to fuck you up. You are
27 fucking with Mongols. Everyone here is going to know that you
28 are little bitches, and they are going to know who the Mongols

1 are."

2 370. On June 6, 2008, at the Mongols "National Run" in San
3 Diego County, defendant CAVAZOS awarded the Mongols "Respect Few
4 Fear None" patch to defendants LOZA and NEWMAN to reward them for
5 the attack on R.H. and J.H. in Pasadena, California, on April 6,
6 2008.

7 371. On June 19, 2008, in San Bernardino County, defendant
8 R. LOZANO sold approximately 62.5 grams of actual methamphetamine
9 to an undercover law enforcement officer, posing as a Mongols
10 member.

11 372. On July 24, 2008, by telephone using coded language,
12 defendant H. GONZALEZ told a confidential government informant
13 that he delivered approximately \$15,000 to \$17,000 in United
14 States currency from Mongols chapters every month to defendants
15 CAVAZOS and R. CAVAZOS, JR.; that CAVAZOS had directed him to
16 destroy the records of collecting the funds; and that the funds
17 collected were now missing.

18 373. On July 24, 2008, defendant RIVERA and David Rivera
19 transported approximately 214.4 grams of actual methamphetamine
20 and \$6,980 in United States currency in Fontana, California.

21 374. On July 26, 2008, defendants CAVAZOS, R. CAVAZOS, JR.,
22 H. GONZALEZ, ROSELI, MUNZ, NIEVES, CANALES, ZUNIGA, and MEDEL,
23 and other unindicted co-conspirators attended a Mongols
24 "presidents" meeting in El Monte, California, and defendant H.
25 GONZALEZ advised the Mongols "presidents" that he would be
26 running the enterprise more strictly and that they should careful
27 about their telephone conversations in order to avoid detection
28 by law enforcement.

1 375. On July 26, 2008, defendant CAVAZOS advised Mongols
2 "presidents" that defendants R. CAVAZOS, JR., RODRIGUEZ, ROSELI,
3 A. CAVAZOS, JR., ARMENDAREZ, FIGUEROA, and SOTO, and others would
4 provide security for CAVAZOS, and defendant MUNOZ advised CAVAZOS
5 that he was angry CAVAZOS had exposed MUNOZ' effort to negotiate
6 with Mexican Mafia representatives and the fact that MUNOZ had
7 tried to kill rival gang members by shooting at them.

8 376. On July 27, 2008, defendant H. GONZALEZ discussed his
9 discovery that CAVAZOS had been stealing cash funds delivered by
10 Mongols to the "Mother Chapter," and that there was believed to
11 be approximately \$150,000 in funds missing from Mongols
12 organization.

13 377. On July 30, 2008, by telephone using coded language,
14 defendant V. RODRIGUEZ delivered approximately 26.1 grams of
15 actual methamphetamine and arranged to sell methamphetamine to an
16 undercover law enforcement officer, who was posing as a Mongols
17 member, and V. RODRIGUEZ told the undercover officer that
18 defendants RODRIGUEZ, MARTINEZ, and VALLE also sold
19 methamphetamine.

20 378. On August 1, 2008, defendant V. RODRIGUEZ delivered
21 approximately 91.1 grams of actual methamphetamine to an
22 undercover law enforcement officer, who was posing as a Mongols
23 member, for \$5,300.

24 379. On August 24, 2008, by telephone using coded language,
25 defendant H. GONZALEZ directed Mongols "Sergeants-at-Arms" that
26 H. GONZALEZ had been "tipped" about possible law enforcement
27 action against the Mongols and that Mongols should be directed to
28 hide illegal items.

380. On August 25, 2008, by telephone using coded language, defendant NIEVES directed Mongols not to display clothing or paraphernalia identifying themselves as Mongols members after a shooting at the "Crazy Girls" bar in Hollywood, California.

5 381. On August 30, 2008, at the "House Lounge" in Vernon,
6 California, defendants H. GONZALEZ and MUNZ led a Mongols "All
7 Members" meeting in which they advised Mongols members that
8 defendant CAVAZOS had stolen money from the organization,
9 provoked greater tension with the Mexican Mafia, and members
10 voted CAVAZOS "out bad" from the organization.

11 382. On August 30, 2008, in Vernon, California, defendant
12 H. GONZALEZ advised Mongols that H. GONZALEZ had met with Mexican
13 Mafia representatives in order to resolve conflicts between the
14 Mexican Mafia and the Mongols, and defendants NIEVES, ZUNIGA,
15 CANALES, and others were identified as national officers and
16 Mongols "Mother Chapter" members.

17 383. On September 17, 2008, in Los Angeles County,
18 California, defendant VASQUEZ possessed approximately 52 grams of
19 methamphetamine, black tar heroin, approximately \$505 in United
20 States currency, digital scales, three cellular telephones,
21 Mongols literature and his Mongols black leather vest, and, when
22 apprehended, told officers that he could not be placed with a
23 general inmate population because he is a Mongol.

THE GRAND JURY FURTHER ALLEGES THAT:

26 1. Beginning on a date unknown and continuing to on or
27 about August 21, 2008, in Los Angeles County, within the Central
28 District of California, defendants CAVAZOS, R. CAVAZOS, JR., H.

1 GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, RAMIREZ,
2 RODRIGUEZ, MUÑOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR.,
3 ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE,
4 FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ,
5 ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL,
6 AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ,
7 BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA,
8 RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE,
9 LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, R. GOMEZ, MCCUALEY, LOUIE,
10 COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, MELCER, LOZA,
11 NEWMAN, MORENO, SAVALA, D. PADILLA, and others known and unknown
12 to the Grand Jury, knowingly and intentionally conspired and
13 agreed with each other to distribute at least 50 grams of actual
14 methamphetamine; a schedule II controlled substance, in violation
15 of Title 21, United States Code, Sections 846, 841(a)(1), and
16 841(b)(1)(A).

17 2. On or about December 4, 2005, in Los Angeles County,
18 within the Central District of California, defendants A.
19 RODRIGUEZ, ARMENDAREZ, R. LOZANO, A. LOZANO, GUTIERREZ, and
20 ANGULO willfully, deliberately, and with premeditation, did aid,
21 abet, advise, encourage, and otherwise participate in the
22 unlawful attempt to kill with malice aforethought D.F., J.V. and
23 S.G., in violation of California Penal Code, Sections 21a, 31,
24 187, and 664.

25 3. On or about July 20, 2006, in Los Angeles County,
26 within the Central District of California, defendant ESPINOZA
27 willfully, deliberately, and with premeditation, unlawfully
28 attempted to kill with malice aforethought S.A., in violation of

1 California Penal Code, Sections 21a, 31, 187, 189, and 664.

2 4. On or about February 14, 2007, in Los Angeles County,
3 within the Central District of California, defendants MONTES and
4 MELCER did willfully, deliberately, and with premeditation, kill
5 with malice aforethought L.H., in violation of California Penal
6 Code, Sections 21a, 31, 187, and 189.

7 5. On or about April 8, 2007, in Los Angeles County,
8 within the Central District of California, defendant MALDONADO
9 willfully, deliberately, and with premeditation, unlawfully
10 attempted to kill with malice aforethought rival gang members in
11 violation of California Penal Code, Sections 21a, 31, 187, 189,
12 and 664.

13 6. On or about June 28, 2007, in Los Angeles County,
14 within the Central District of California, defendant MELGOZA
15 willfully, deliberately, and with premeditation, unlawfully
16 attempted to kill with malice aforethought M.T., in violation of
17 California Penal Code, Sections 21a, 31, 187, 189, and 664.

18 7. On or about August 18, 2007, in Los Angeles County,
19 within the Central District of California, defendants CAVAZOS and
20 WILSON willfully, deliberately, and with premeditation, conspired
21 to kill with malice aforethought rival gang members, in violation
22 of California Penal Code, Sections 21a, 31, 182, 187, and 189.

23 8. On or about April 6, 2008, in Pasadena, California,
24 within the Central District of California, defendants LOZA and
25 NEWMAN willfully, deliberately, and with premeditation,
26 unlawfully attempted to kill with malice aforethought R.H. and
27 J.H., in violation of California Penal Code, Sections 21a, 31,
28 187, 189, and 664.

1 COUNT TWO

2 [18 U.S.C. § 1962(c)]

3 1. Paragraphs One through Seventeen of the General
4 Allegations are re-alleged and incorporated by reference as
5 though fully set forth herein.

6 THE RACKETEERING OFFENSE

7 2. Beginning on a date unknown and continuing to on or
8 about October 9, 2008, in Los Angeles County, within the Central
9 District of California, and elsewhere, defendants CAVAZOS, R.
10 CAVAZOS, JR., H. GONZALEZ, ROSELI, TINOCO, MUNZ, WILSON,
11 RODRIGUEZ, MUÑOZ, J. GARCIA, BUSS, SOTO, RIOS, ARMENDAREZ, R.
12 LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ,
13 VIRAMONTES, J. GONZALEZ, ZUNIGA, TELLEZ, OWENS, MOREIN, L.
14 PADILLA, TRUJILLO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ,
15 BRADEN, MELGOZA, ANGULO, CONTRERAS, ESPINOZA, RIVERA, LEMAY,
16 CORDOVA, R. GOMEZ, MELCER, LOZA, NEWMAN, and D. PADILLA, and
17 others known and unknown to the Grand Jury, being persons
18 employed by and associated with the Mongols criminal enterprise,
19 which was an enterprise engaged in, and the activities of which
20 affected, interstate and foreign commerce, unlawfully and
21 knowingly did conduct and participate, directly and indirectly,
22 in the conduct of the affairs of that enterprise, through a
23 pattern of racketeering activity, that is, through the commission
24 of the acts set forth below.

25 THE PATTERN OF RACKETEERING ACTIVITY

26 3. The pattern of racketeering activity, as defined in
27 Title 18, United States Code, Sections 1961(1) and 1961(5),
28 consisted of the following acts:

1 Racketeering Act One

2 Conspiracy to Distribute Narcotics

3 4. Beginning on a date unknown to the Grand Jury and
4 continuing to on or about October 9, 2008, in Los Angeles County,
5 within the Central District of California, and elsewhere,
6 defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ, ROSELI, TINOCO,
7 MUNZ, WILSON, RODRIGUEZ, MUÑOZ, J. GARCIA, BUSS, SOTO,
8 ARMENDAREZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA,
9 GIL, GUTIERREZ, VIRAMONTES, J. GONZALEZ, AZANEDO, ZUNIGA, TELLEZ,
10 OWENS, MOREIN, L. PADILLA, TRUJILLO, MALDONADO, MONTES, WEDIG, V.
11 RODRIGUEZ, BRADEN, MELGOZA, RIOS, ANGULO, CONTRERAS, ESPINOZA,
12 RIVERA, LEMAY, CORDOVA, R. GOMEZ, MELCER, LOZA, NEWMAN, and D.
13 PADILLA, and others known and unknown to the Grand Jury,
14 conspired and agreed with each other to knowingly and
15 intentionally commit the following offenses:

16 a. To distribute at least 500 grams of a mixture or
17 substance containing a detectable amount of cocaine, a schedule
18 II controlled substance, in violation of Title 21, United States
19 Code, Sections 841(a)(1) and 841(b)(1)(B);

20 b. To distribute at least 50 grams of actual
21 methamphetamine, a schedule II controlled substance, in violation
22 of Title 21, United States Code, Sections 841(a)(1) and
23 841(b)(1)(A); and

24 c. To distribute at least five grams of actual
25 methamphetamine, a schedule II controlled substance, in violation
26 of Title 21, United States Code, Sections 841(a)(1) and
27 841(b)(1)(B).

28

1 Racketeering Act Two

2 Conspiracy to Commit Money Laundering

3 5. Beginning on a date unknown and continuing until on or
4 about October 9, 2008, in Los Angeles County, within the Central
5 District of California, and elsewhere, defendants CAVAZOS, R.
6 CAVAZOS, JR., H. GONZALEZ, ROSELI, TINOCO, MUNZ, WILSON, J.
7 GARCIA, and RIOS, and others known and unknown to the Grand Jury,
8 knowingly and intentionally conspired and agreed with each other
9 to conduct financial transactions, knowing that the property
10 involved in the financial transactions represented the proceeds
11 of some form of unlawful activity, and which property was, in
12 fact, the proceeds of specified unlawful activity, that is,
13 conspiracy to distribute cocaine and methamphetamine, with the
14 intent to promote the carrying on of said specified unlawful
15 activity, and to conceal and disguise the nature, location,
16 source, ownership, and control the proceeds of said specified
17 unlawful activity, in violation of Title 18, United States Code,
18 Sections 1956(a)(1)(A)(I) and 1956(a)(1)(B)(I).

19 Racketeering Act Three

20 Distribution of Cocaine

21 6. On or about August 12, 2005, in Los Angeles County,
22 within the Central District of California, defendant VIRAMONTES
23 knowingly and intentionally distributed cocaine, a schedule II
24 controlled substance, in violation of Title 21, United States
25 Code, Section 841(a)(1).

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1 Racketeering Act Four

2 Distribution of Methamphetamine

3 7. On or about November 3, 2005, in Los Angeles County,
4 within the Central District of California, defendant VIRAMONTES
5 knowingly and intentionally distributed methamphetamine, a
6 schedule II controlled substance, in violation of Title 21,
7 United States Code, Section 841(a)(1).

8 Racketeering Act Five

9 Attempted Murder

10 8. On or about December 4, 2005, in Riverside County,
11 within the Central District of California, defendants RODRIGUEZ,
12 ARMENDAREZ, R. LOZANO, A. LOZANO, GUTIERREZ, and ANGULO
13 willfully, deliberately, and with premeditation, unlawfully
14 attempted to kill with malice aforethought D.F., J.V., and S.G.,
15 in violation of California Penal Code, Sections 21a, 31, 187,
16 189, and 664.

17 Racketeering Act Six

18 Distribution of Methamphetamine

19 9. On or about January 19, 2006, in Los Angeles County,
20 within the Central District of California, defendant J. GONZALEZ
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Seven

25 Distribution of Methamphetamine

26 10. On or about February 9, 2006, in Los Angeles County,
27 within the Central District of California, defendants J. GONZALEZ
28 and R. GOMEZ knowingly and intentionally distributed

1 methamphetamine, a schedule II controlled substance, in violation
2 of Title 21, United States Code, Section 841(a)(1).

3 Racketeering Act Eight

4 Distribution of Methamphetamine

5 11. On or about February 18, 2006, in Los Angeles County,
6 within the Central District of California, defendants J. GARCIA
7 and R. GOMEZ knowingly and intentionally distributed
8 methamphetamine, a schedule II controlled substance, in violation
9 of Title 21, United States Code, Section 841(a)(1).

10 Racketeering Act Nine

11 Distribution of Methamphetamine

12 12. On or about March 1, 2006, in Los Angeles County,
13 within the Central District of California, defendant TELLEZ
14 knowingly and intentionally distributed methamphetamine, a
15 schedule II controlled substance, in violation of Title 21,
16 United States Code, Section 841(a)(1).

17 Racketeering Act Ten

18 Distribution of Methamphetamine

19 13. On or about March 2, 2006, in San Bernardino County,
20 within the Central District of California, defendant D. PADILLA
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Eleven

25 Distribution of Methamphetamine

26 14. On or about March 3, 2006, in Los Angeles County,
27 within the Central District of California, defendant D. PADILLA
28 knowingly and intentionally distributed methamphetamine, a

1 schedule II controlled substance, in violation of Title 21,
2 United States Code, Section 841(a)(1).

3 Racketeering Act Twelve

4 Distribution of Methamphetamine

5 15. On or about March 22, 2006, in Los Angeles County,
6 within the Central District of California, defendant TELLEZ
7 knowingly and intentionally distributed methamphetamine, a
8 schedule II controlled substance, in violation of Title 21,
9 United States Code, Section 841(a)(1).

10 Racketeering Act Thirteen

11 Distribution of Cocaine

12 16. On or about March 23, 2006, in Los Angeles County,
13 within the Central District of California, defendant ZUNIGA
14 knowingly and intentionally distributed cocaine, a schedule II
15 narcotic drug controlled substance, in violation of Title 21,
16 United States Code, Section 841(a)(1).

17 Racketeering Act Fourteen

18 Distribution of Methamphetamine

19 17. On or about March 29, 2006, in Los Angeles County,
20 within the Central District of California, defendant J. GONZALEZ
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Fifteen

25 Distribution of Methamphetamine

26 18. On or about May 4, 2006, in Los Angeles County, within
27 the Central District of California, defendant OWENS knowingly and
28 intentionally distributed methamphetamine, a schedule II

1 controlled substance, in violation of Title 21, United States
2 Code, Section 841(a)(1).

3 Racketeering Act Sixteen

4 Distribution of Methamphetamine

5 19. On or about May 10, 2006, in Los Angeles County, within
6 the Central District of California, defendant TELLEZ knowingly
7 and intentionally distributed methamphetamine, a schedule II
8 controlled substance, in violation of Title 21, United States
9 Code, Section 841(a)(1).

10 Racketeering Act Seventeen

11 Distribution of Methamphetamine

12 20. On or about May 18, 2006, in Los Angeles County, within
13 the Central District of California, defendant R. GOMEZ knowingly
14 and intentionally distributed methamphetamine, a schedule II
15 controlled substance, in violation of Title 21, United States
16 Code, Section 841(a)(1).

17 Racketeering Act Eighteen

18 Distribution of Methamphetamine

19 21. On or about May 24, 2006, in Los Angeles County, within
20 the Central District of California, defendants RODRIGUEZ and GIL
21 knowingly and intentionally distributed methamphetamine, a
22 schedule II controlled substance, in violation of Title 21,
23 United States Code, Section 841(a)(1).

24 Racketeering Act Nineteen

25 Distribution of Methamphetamine

26 22. On or about May 24, 2006, in Los Angeles County, within
27 the Central District of California, defendant R. GOMEZ knowingly
28 and intentionally distributed methamphetamine, a schedule II

1 controlled substance, in violation of Title 21, United States
2 Code, Section 841(a)(1).

3 Racketeering Act Twenty

4 Distribution of Methamphetamine

5 23. On or about May 31, 2006, in Los Angeles County, within
6 the Central District of California, defendant GIL knowingly and
7 intentionally distributed methamphetamine, a schedule II
8 controlled substance, in violation of Title 21, United States
9 Code, Section 841(a)(1).

10 Racketeering Act Twenty-One

11 Distribution of Methamphetamine

12 24. On or about June 3, 2006, in Clark County, Nevada,
13 defendants VIRAMONTES and LEMAY knowingly and intentionally
14 distributed methamphetamine, a schedule II controlled substance,
15 in violation of Title 21, United States Code, Section 841(a)(1).

16 Racketeering Act Twenty-Two

17 Distribution of Methamphetamine

18 25. On or about June 8, 2006, in Los Angeles County, within
19 the Central District of California, defendant GIL knowingly and
20 intentionally distributed methamphetamine, a schedule II
21 controlled substance, in violation of Title 21, United States
22 Code, Section 841(a)(1).

23 Racketeering Act Twenty-Three

24 Distribution of Methamphetamine

25 26. On or about June 22, 2006, in Los Angeles County,
26 within the Central District of California, defendant RODRIGUEZ
27 knowingly and intentionally distributed methamphetamine, a
28 schedule II controlled substance, in violation of Title 21,

1 United States Code, Section 841(a)(1).

2 Racketeering Act Twenty-Four

3 Distribution of Methamphetamine

4 27. On or about July 18, 2006, in Los Angeles County,
5 within the Central District of California, defendant RODRIGUEZ
6 knowingly and intentionally distributed methamphetamine, a
7 schedule II controlled substance, in violation of Title 21,
8 United States Code, Section 841(a)(1).

9 Racketeering Act Twenty-Five

10 Distribution of Methamphetamine

11 28. On or about July 19, 2006, in Los Angeles County,
12 within the Central District of California, defendant SOTO
13 knowingly and intentionally distributed methamphetamine, a
14 schedule II controlled substance, in violation of Title 21,
15 United States Code, Section 841(a)(1).

16 Racketeering Act Twenty-Six

17 Attempted Murder

18 29. On or about July 20, 2006, in Los Angeles County,
19 within the Central District of California, defendant ESPINOZA
20 unlawfully, willfully, deliberately, and with premeditation, did
21 attempt to kill with malice aforethought S.A., in violation of
22 California Penal Code, Sections 21a, 31, 664, 187, and 189.

23 Racketeering Act Twenty-Seven

24 Distribution of Methamphetamine

25 30. On or about July 21, 2006, in Los Angeles County,
26 within the Central District of California, defendants RODRIGUEZ
27 and GIL knowingly and intentionally distributed methamphetamine,
28 a schedule II controlled substance, in violation of Title 21,

1 United States Code, Section 841(a)(1).

2 Racketeering Act Twenty-Eight

3 Distribution of Methamphetamine

4 31. On or about July 22, 2006, in Los Angeles County,
5 within the Central District of California, defendant SOTO
6 knowingly and intentionally distributed methamphetamine, a
7 schedule II controlled substance, in violation of Title 21,
8 United States Code, Section 841(a)(1).

9 Racketeering Act Twenty-Nine

10 Distribution of Methamphetamine

11 32. On or about July 25, 2006, in Los Angeles County,
12 within the Central District of California, defendant SOTO
13 knowingly and intentionally distributed methamphetamine, a
14 schedule II controlled substance, in violation of Title 21,
15 United States Code, Section 841(a)(1).

16 Racketeering Act Thirty

17 Distribution of Methamphetamine

18 33. On or about August 16, 2006, in Los Angeles County,
19 within the Central District of California, defendant GIL
20 knowingly and intentionally distributed methamphetamine, a
21 schedule II controlled substance, in violation of Title 21,
22 United States Code, Section 841(a)(1).

23 Racketeering Act Thirty-One

24 Distribution of Methamphetamine

25 34. On or about August 17, 2006, in Riverside County,
26 within the Central District of California, defendants ARMENDAREZ
27 and R. LOZANO knowingly and intentionally distributed
28 methamphetamine, a schedule II controlled substance, in violation

1 of Title 21, United States Code, Section 841(a)(1).

2 Racketeering Act Thirty-Two

3 Distribution of Methamphetamine

4 35. On or about August 24, 2006, in Los Angeles County,
5 within the Central District of California, defendants RODRIGUEZ
6 and AZANEDO knowingly and intentionally distributed
7 methamphetamine, a schedule II controlled substance, in violation
8 of Title 21, United States Code, Section 841(a)(1).

9 Racketeering Act Thirty-Three

10 Distribution of Methamphetamine

11 37. On or about November 26, 2006, in Los Angeles County,
12 within the Central District of California, defendants RODRIGUEZ
13 and GIL knowingly and intentionally distributed methamphetamine,
14 a schedule II controlled substance, in violation of Title 21,
15 United States Code, Section 841(a)(1).

16 Racketeering Act Thirty-Four

17 Possession with Intent to Distribute Methamphetamine

18 38. On or about December 1, 2006, in Los Angeles County,
19 within the Central District of California, defendant CONTRERAS
20 knowingly and intentionally possessed with the intent to
21 distribute methamphetamine, a schedule II controlled substance,
22 in violation of Title 21, United States Code, Section 841(a)(1).

23 Racketeering Act Thirty-Five

24 Distribution of Cocaine

25 39. On or about December 1, 2006, in Clark County, Nevada,
26 defendant CORDOVA knowingly and intentionally distributed
27 cocaine, a schedule II narcotic drug controlled substance, in
28 violation of Title 21, United States Code, Section 841(a)(1).

1 Racketeering Act Thirty-Six

2 Attempted Murder

3 40. On or about December 10, 2006, in Los Angeles County,
4 within the Central District of California, defendants BUSS, RIOS,
5 WEDIG, and BRADEN willfully, deliberately, and with
6 premeditation, unlawfully attempted to kill with malice
7 aforethought A.S., in violation of California Penal Code,
8 Sections 21a, 31, 187, 189, and 664.

9 Racketeering Act Thirty-Seven

10 Distribution of Methamphetamine

11 41. On or about February 9, 2007, in San Bernardino County,
12 within the Central District of California, defendant R. LOZANO
13 knowingly and intentionally distributed methamphetamine, a
14 schedule II controlled substance, in violation of Title 21,
15 United States Code, Section 841(a)(1).

16 Racketeering Act Thirty-Eight

17 Distribution of Cocaine

18 42. On or about February 10, 2006, in Clark County, Nevada,
19 defendant CORDOVA knowingly and intentionally distributed
20 cocaine, a schedule II narcotic drug controlled substance, in
21 violation of Title 21, United States Code, Section 841(a)(1).

22 Racketeering Act Thirty-Nine

23 Murder

24 43. On or about February 14, 2007, in Los Angeles County,
25 within the Central District of California, defendants MONTES and
26 MELCER with malice aforethought willfully participated in the
27 murder of L.H., in violation of California Penal Code, Sections
28 31, 187, and 189.

1 Racketeering Act Forty

2 Distribution of Methamphetamine

3 44. On or about March 23, 2007, in San Bernardino County,
4 within the Central District of California, defendant R. LOZANO
5 knowingly and intentionally distributed methamphetamine, a
6 schedule II controlled substance, in violation of Title 21,
7 United States Code, Section 841(a)(1).

8 Racketeering Act Forty-One

9 Distribution of Methamphetamine

10 45. On or about March 23, 2007, in San Bernardino County,
11 within the Central District of California, defendant ARMENDAREZ
12 knowingly and intentionally distributed methamphetamine, a
13 schedule II controlled substance, in violation of Title 21,
14 United States Code, Section 841(a)(1).

15 Racketeering Act Forty-Two

16 Distribution of Methamphetamine

17 46. On or about April 7, 2007, in Los Angeles County,
18 within the Central District of California, defendant PONCE
19 knowingly and intentionally distributed methamphetamine, a
20 schedule II controlled substance, in violation of Title 21,
21 United States Code, Section 841(a)(1).

22 Racketeering Act Forty-Three

23 Attempted Murder

24 47. On or about April 8, 2007, in Los Angeles County,
25 within the Central District of California, defendant MALDONADO
26 willfully, deliberately, and with premeditation, unlawfully
27 attempted to kill with malice aforethought M.G. and Z.S., in
28 violation of California Penal Code, Sections 21a, 31, 187, 189,

1 and 664.

2 Racketeering Act Forty-Four

3 Distribution of Methamphetamine

4 48. On or about May 22, 2007, in Los Angeles County, within
5 the Central District of California, defendant M. GARCIA knowingly
6 and intentionally distributed methamphetamine, a schedule II
7 controlled substance, in violation of Title 21, United States
8 Code, Section 841(a)(1).

9 Racketeering Act Forty-Five

10 Distribution of Methamphetamine

11 49. On or about June 7, 2007, in Los Angeles County, within
12 the Central District of California, defendant MOREIN knowingly
13 and intentionally distributed methamphetamine, a schedule II
14 controlled substance, in violation of Title 21, United States
15 Code, Section 841(a)(1).

16 Racketeering Act Forty-Six

17 Attempted Murder

18 50. On or about July 28, 2007, in Riverside County, within
19 the Central District of California, defendant MELGOZA willfully,
20 deliberately, and with premeditation, unlawfully attempted to
21 kill with malice aforethought M.T. and others, in violation of
22 California Penal Code, Sections 21a, 31, 187, 189, and 664.

23 Racketeering Act Forty-Seven

24 Possession with Intent to Distribute Methamphetamine

25 51. On or about November 21, 2007, in Los Angeles County,
26 within the Central District of California, defendant MUNOZ
27 knowingly and intentionally possessed with the intent to
28 distribute methamphetamine, a schedule II controlled substance,

1 in violation of Title 21, United States Code, Section 841(a)(1).

2 Racketeering Act Forty-Eight

3 Possession with Intent to Distribute Methamphetamine

4 52. On or about December 13, 2007, in Los Angeles County,
5 within the Central District of California, defendants RODRIGUEZ,
6 L. PADILLA, and TRUJILLO knowingly and intentionally possessed
7 with the intent to distribute methamphetamine, a schedule II
8 controlled substance, in violation of Title 21, United States
9 Code, Section 841(a)(1).

10 Racketeering Act Forty-Nine

11 Conspiracy to Commit Murder

12 53. On or about August 18, 2007, in Los Angeles County and
13 elsewhere, defendants CAVAZOS and WILSON, and others conspired to
14 murder rival gang members in Indianapolis, Indiana, in violation
15 of California Penal Code, Sections 21a, 31, 182, 187, and 189.

16 Racketeering Act Fifty

17 Distribution of Methamphetamine

18 54. On or about February 12, 2008, in Los Angeles County,
19 within the Central District of California, defendant R. LOZANO
20 and RIVERA knowingly and intentionally distributed
21 methamphetamine, a schedule II controlled substance, in violation
22 of Title 21, United States Code, Section 841(a)(1).

23 Racketeering Act Fifty-One

24 Possession with the Intent to Distribute Methamphetamine

25 55. On or about April 1, 2008, in Los Angeles County,
26 within the Central District of California, defendant FIGUEROA
27 knowingly and intentionally possessed methamphetamine, a schedule
28 II controlled substance, with the intent to distribute it to

1 others, in violation of Title 21, United States Code, Section
2 841(a)(1).

3 Racketeering Act Fifty-Two

4 Attempted Murder

5 56. On or about April 6, 2008, in Pasadena, California,
6 defendants LOZA and NEWMAN willfully, deliberately, and with
7 premeditation, unlawfully attempted to kill with malice
8 aforethought R.H. and J.H., in violation of California Penal
9 Code, Sections 21a, 31, 187, 189, and 664.

10 Racketeering Act Fifty-Three

11 Distribution of Methamphetamine

12 57. On or about April 10, 2008, in Los Angeles County,
13 within the Central District of California, defendant GUTIERREZ
14 knowingly and intentionally distributed methamphetamine, a
15 schedule II controlled substance, in violation of Title 21,
16 United States Code, Section 841(a)(1).

17 Racketeering Act Fifty-Four

18 Distribution of Methamphetamine

19 58. On or about May 1, 2008, in Los Angeles County, within
20 the Central District of California, defendant GUTIERREZ knowingly
21 and intentionally distributed methamphetamine, a schedule II
22 controlled substance, in violation of Title 21, United States
23 Code, Section 841(a)(1).

24 Racketeering Act Fifty-Five

25 Possession with Intent to Distribute Methamphetamine

26 59. On or about July 30, 2008, in Los Angeles County,
27 within the Central District of California, defendant V. RODRIGUEZ
28 knowingly and intentionally possessed with the intent to

1 distribute methamphetamine, a schedule II controlled substance,
2 in violation of Title 21, United States Code, Section 841(a)(1).

3 Racketeering Act Fifty-Six

4 Possession with Intent to Distribute Methamphetamine

5 60. On or about August 1, 2008, in Los Angeles County,
6 within the Central District of California, defendant V. RODRIGUEZ
7 knowingly and intentionally possessed with the intent to
8 distribute methamphetamine, a schedule II controlled substance,
9 in violation of Title 21, United States Code, Section 841(a)(1).

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1 COUNT THREE

2 [18 U.S.C. § 1959(a)(5)]

3 1. At all times relevant to this Indictment, the Mongols
4 criminal enterprise, as described more particularly in paragraphs
5 One through Seventeen of the General Allegations, which
6 paragraphs are incorporated and re-alleged herein as if set forth
7 in full, constituted an enterprise as that term is defined in
8 Title 18, United States Code, Section 1959(b)(2), that is, a
9 group of individuals associated in fact, which was engaged in,
10 and the activities of which affected, interstate and foreign
11 commerce.

12 2. At all times relevant to this Indictment, the Mongols
13 criminal enterprise, through its members and associates, engaged
14 in racketeering activity, as defined in Title 18, United States
15 Code, Sections 1959(b)(1) and 1961(1), that is, acts involving
16 murder, robbery, and extortion, in violation of the California
17 Penal Code; the distribution of controlled substances, including
18 methamphetamine and cocaine, in violation of Title 21, United
19 States Code, Sections 841(a)(1) and 846; and acts indictable
20 under Title 18, United States Code, Sections 1956 and 1957 (money
21 laundering).

22 3. On or about December 4, 2005, within the Central
23 District of California and elsewhere, for the purpose of
24 maintaining and increasing position in the Mongols criminal
25 enterprise, an enterprise engaged in racketeering activity,
26 defendants RODRIGUEZ, ARMENDAREZ, R. LOZANO, A. LOZANO,
27 GUTIERREZ, and ANGULO unlawfully and knowingly attempted to kill
28 D.F., J.V., and S.G., in violation of California Penal Code

1 Sections 31 and 187, all in violation of Title 18, United States
2 Code, Section 1959(a)(5).
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1 COUNT FOUR

2 [18 U.S.C. § 1959(a)(5)]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about July 20, 2006, in Los Angeles County,
7 within the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendant ESPINOZA did unlawfully and knowingly attempt to murder
11 S.A., in violation of California Penal Code, Sections 31, 664,
12 and 187, all in violation of Title 18, United States Code,
13 Section 1959(a)(5).

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1 COUNT FIVE

2 [18 U.S.C. § 1959(a)(5)]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about December 10, 2006, in Los Angeles County,
7 within the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendants BUSS, RIOS, WEDIG, and BRADEN did unlawfully and
11 knowingly attempt to kill A.S., in violation of California Penal
12 Code, Sections 21a, 31, 664, 187, and 189 all in violation of
13 Title 18, United States Code, Section 1959(a)(5).

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1 COUNT SIX
2 [18 U.S.C. § 1959(a)(1)]
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4 1. Paragraphs One through Seventeen of the General
5 Allegations and Paragraphs One and Two of Count Three are hereby
incorporated and re-alleged herein as if set forth in full.
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7 2. On or about February 14, 2007, within the Central
8 District of California and elsewhere, for the purpose of
9 maintaining and increasing position in the Mongols criminal
10 enterprise, an enterprise engaged in racketeering activity,
defendants MONTES and MELCER unlawfully and with malice
11 aforethought willfully participated in the murder of L.H., in
12 violation of California Penal Code Sections 31 and 189, all in
13 violation of Title 18, United States Code, Section 1959(a)(1).
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1 COUNT SEVEN
2 [18 U.S.C. §§ 1959(a)(2), 3]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about April 8, 2007, in Los Angeles County,
7 within the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendant MALDONADO did unlawfully and knowingly maim M.G., in
11 violation of California Penal Code, Sections 31 and 203, all in
12 violation of Title 18, United States Code, Section 1959(a)(2).

13 3. After the commission of the above-described offense,
14 defendants CAVAZOS, ROSELI, MUNZ, ALARCON, MORALES and EUSTICE
15 received, relieved, comforted, and assisted MALDONADO in order to
16 hinder or prevent MALDONADO's apprehension, trial, or punishment,
17 in violation of Title 18, United States Code, Section 3.

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1 COUNT EIGHT
2 [18 U.S.C. §§ 1959(a)(5), 3]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about April 8, 2007, in Los Angeles County,
7 within the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendant MALDONADO did unlawfully and knowingly attempt to kill
11 M.G. and Z.S., in violation of California Penal Code, Sections
12 31, 664, and 187, all in violation of Title 18, United States
13 Code, Section 1959(a)(5).

14 3. After the commission of the above-described offense,
15 defendants CAVAZOS, ROSELI, MUNZ, ALARCON, MORALES and EUSTICE
16 received, relieved, comforted, and assisted MALDONADO in order to
17 hinder or prevent his apprehension, trial, or punishment, in
18 violation of Title 18, United States Code, Section 3.

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1 COUNT NINE

2 [18 U.S.C. § 1959(a)(5)]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about July 28, 2007, in Los Angeles County,
7 within the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendant MELGOZA did unlawfully and knowingly attempt to murder
11 M.T., in violation of California Penal Code, Sections 31, 664,
12 and 187, all in violation of Title 18, United States Code,
13 Section 1959(a)(5).

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1 COUNT TEN
2 [18 U.S.C. § 1959(a)(5)]
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4 1. Paragraphs One through Seventeen of the General
5 Allegations and Paragraphs One and Two of Count Three are hereby
incorporated and re-alleged herein as if set forth in full.
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7 2. On or about August 18, 2007, in Los Angeles County,
8 within the Central District of California, for the purpose of
9 maintaining and increasing position in the Mongols criminal
10 enterprise, an enterprise engaged in racketeering activity,
11 defendants CAVAZOS and WILSON unlawfully conspired to murder
12 rival gang members, in violation of California Penal Code,
13 Sections 21a, 31, 187, and 664, all in violation of Title 18,
United States Code, Section 1959(a)(5).
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1 COUNT ELEVEN

2 [18 U.S.C. § 1959(a)(5)]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about April 6, 2008, in Los Angeles County,
7 within the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendants LOZA and NEWMAN did unlawfully and knowingly attempt
11 to murder R.H. and J.H., in violation of California Penal Code,
12 Sections 31, 664, and 187, all in violation of Title 18, United
13 States Code, Section 1959(a)(5).

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1 COUNT TWELVE

2 [18 U.S.C. § 1959(a)(5)]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about April 27, 2008, in Los Angeles County,
7 within the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendants LOUIE, COTTINI and NAVA did unlawfully and knowingly
11 attempt to murder N.G., in violation of California Penal Code,
12 Sections 31, 664, and 187, all in violation of Title 18, United
13 States Code, Section 1959(a)(5).

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1 COUNT THIRTEEN
2 [18 U.S.C. § 1959(a)(3)]

3 1. Paragraphs One through Seventeen of the General
4 Allegations and Paragraphs One and Two of Count Three are hereby
5 incorporated and re-alleged herein as if set forth in full.

6 2. On or about May 24, 2008, in Los Angeles County, within
7 the Central District of California, for the purpose of
8 maintaining and increasing position in the Mongols criminal
9 enterprise, an enterprise engaged in racketeering activity,
10 defendants R. CAVAZOS, JR., and MCCUALEY unlawfully did assault
11 D.Q. with a dangerous weapon, namely, a .45 caliber firearm, in
12 violation of California Penal Code Section 245(a)(2), and in
13 violation of Title 18, United States Code, Section 1959(a)(3).

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1 COUNT FOURTEEN

2 [21 U.S.C. § 846]

3 1. Paragraphs One through Seventeen of the Introductory
4 Allegations are re-alleged and incorporated herein by reference
5 as though fully set forth herein.

6 A. OBJECTS OF THE CONSPIRACY

7 Beginning on a date unknown, and continuing to on or about
8 October 9, 2008, in Los Angeles County, within the Central
9 District of California, and elsewhere, defendants CAVAZOS, R.
10 CAVAZOS, JR., H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON,
11 W. RAMIREZ, RODRIGUEZ, MUÑOZ, J. GARCIA, BUSS, SOTO, RIOS, A.
12 CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M.
13 GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J.
14 GONZALEZ, ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO,
15 MEDEL, AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ,
16 BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA,
17 RIVERA, DAVID RIVERA ("D. RIVERA"), REYNOLDS, I. PADILLA, HULL,
18 TREVINO, CHEVILLE, VALLE, LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA,
19 R. GOMEZ, MCCUALEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM
20 RAMIREZ, LOZA, NEWMAN, MORENO, SAVALA, VASQUEZ, D. PADILLA, and
21 others known and unknown to the Grand Jury, knowingly and
22 intentionally conspired and agreed with each other to commit the
23 following offenses:

24 1. To distribute at least 50 grams of actual
25 methamphetamine, in violation of Title 21, United States Code,
26 Sections 841(a)(1) and 841(b)(1)(A)(viii);

27 5. To distribute at least five grams of actual
28 methamphetamine, a schedule II controlled substance, in violation

1 of Title 21, United States Code, Sections 841(a)(1) and
2 841(b)(1)(B)(viii); and

3 3. To distribute at least 500 grams of a mixture or
4 substance containing a detectable amount of cocaine, a schedule
5 II narcotic drug controlled substance, in violation of Title 21,
6 United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

7 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
8 ACCOMPLISHED

9 The objects of the conspiracy were to be accomplished in
10 substance as follows:

11 1. Defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ,
12 ROSELI, NIEVES, TINOCO, MUNZ, WILSON, RODRIGUEZ, BUSS, and RIOS
13 would conduct organizational meetings and direct Mongols in the
14 conduct of robberies, assaults, murders, extortion, and drug
15 trafficking, as well as the collection and management of proceeds
16 generated through the commission of unlawful activities from
17 Mongols members, in order to promote and further the activities
18 of the Mongols gang.

19 2. Defendants NIEVES, W. RAMIREZ, J. GARCIA, SOTO,
20 CANALES, J. GONZALEZ, MEDEL, and WEDIG, and others known and
21 unknown to the Grand Jury, would direct lower-ranking Mongols
22 members and prospective Mongols members about the activities of
23 the gang and their responsibilities for the organization and
24 deliver proceeds generated through the commission of unlawful
25 activities from Mongols members, prospects and the regional
26 chapters to the Mongols "Mother Chapter" leadership.

27 3. Defendants RODRIGUEZ, MUÑOZ, J. GARCIA, BUSS, SOTO,
28 RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R. LOZANO, A.

1 LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES,
2 J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ, LEYVA, OWENS, MOREIN, L.
3 PADILLA, TRUJILLO, MEDEL, AZANEDO, MALDONADO, WEDIG, V.
4 RODRIGUEZ, CHAVEZ, MELGOZA, RIOS, CONTRERAS, RIVERA, D. RIVERA,
5 REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, VALLE, LEMAY,
6 SHAWLEY, CORDOVA, WILLIAM RAMIREZ, MORENO, SAVALA, VASQUEZ, and
7 D. PADILLA, and others would obtain and distribute
8 methamphetamine and cocaine to Mongols members, associates and
9 narcotics customers.

10 4. Defendant CAVAZOS and others would negotiate with
11 Mexican Mafia representatives to address the collection of "tax"
12 payments for the narcotics trafficking activities of Mongols
13 members in areas otherwise controlled by the Mexican Mafia.

14 5. Defendants CAVAZOS, H. GONZALEZ, ROSELI, NIEVES,
15 TINOCO, MUNZ, WILSON, W. RAMIREZ, RODRIGUEZ, MUÑOZ, J. GARCIA,
16 BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R.
17 LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ,
18 VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ,
19 LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL, MALDONADO,
20 WEDIG, V. RODRIGUEZ, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, RIOS,
21 ANGULO, CONTRERAS, ESPINOZA, RIVERA, D. RIVERA, REYNOLDS, I.
22 PADILLA, HULL, TREVINO, CHEVILLE, SHAWLEY, PRICE, MCCUALEY,
23 LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, LOZA,
24 NEWMAN, MORENO, and SAVALA, and others known and unknown to the
25 Grand Jury would obtain firearms, knives, bullet-proof vests, and
26 explosives to be used to enforce the authority of the Mongols
27 against rival gang members, the general public, and law
28 enforcement.

1 6. Defendants CAVAZOS, R. CAVAZOS, JR., H. GONZALEZ,
2 ROSELI, NIEVES, MUNZ, and WILSON would direct Mongols members to
3 travel to different locations and commit acts of violence,
4 including murder, against rival gang members, law enforcement or
5 other persons who would challenge the authority of the Mongols
6 organization.

7 7. Defendants MUNZ, W. RAMIREZ, RODRIGUEZ, MUÑOZ, J.
8 GARCIA, BUSS, SOTO, RIOS, ARMENDAREZ, R. MARTINEZ, R. LOZANO, A.
9 LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ, VIRAMONTES,
10 CANALES, J. GONZALEZ, ZUNIGA, TELLEZ, R. GOMEZ, LEYVA, OWENS,
11 MOREIN, L. PADILLA, TRUJILLO, MEDEL, MALDONADO, MONTES, WEDIG, A.
12 LOPEZ, BRADEN, CHAVEZ, MELGOZA, ANGULO, CONTRERAS, ESPINOZA,
13 RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO, CHEVILLE, NAVA,
14 SHAWLEY, PRICE, MCCUALEY, LOUIE, COTTINI, S. GONZALEZ, LOZA,
15 NEWMAN, MORENO, and SAVALA, and others known and unknown to the
16 Grand Jury would commit acts of violence, including murder,
17 against rival gang members, law enforcement or other persons who
18 would challenge the authority of the Mongols organization.

19 8. Defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ,
20 and others would conduct financial transactions to conceal the
21 proceeds derived from the crimes of the organization and convert
22 those proceeds to further the crimes of the Mongols and enrich
23 themselves.

24 9. Defendants CAVAZOS, R. CAVAZOS, JR., NIEVES, WILSON, J.
25 GARCIA, and SOTO and others known and unknown to the Grand Jury
26 would recruit new members to the Mongols organization and direct
27 their initiation into the gang.

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1 C. OVERT ACTS

2 In furtherance of the conspiracy, and to accomplish the
3 objects of the conspiracy, defendants CAVAZOS, R. CAVAZOS, JR.,
4 H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, W. RAMIREZ,
5 RODRIGUEZ, MUÑOZ, J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR.,
6 ARMENDAREZ, R. MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE,
7 FIGUEROA, GIL, GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ,
8 ZUNIGA, LEYVA, OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL,
9 AZANEDO, MALDONADO, MONTES, WEDIG, V. RODRIGUEZ, A. LOPEZ,
10 BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO, CONTRERAS, ESPINOZA,
11 RIVERA, D. RIVERA, REYNOLDS, I. PADILLA, HULL, REVINO, CHEVILLE,
12 VALLE, LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, R. GOMEZ, MCCUALEY,
13 LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ, LOZA,
14 NEWMAN, MORENO, SAVALA, VASQUEZ, and D. PADILLA, and others known
15 and unknown to the Grand Jury committed various overt acts,
16 within the Central District of California and elsewhere,
17 including overt acts numbered 1 through 383 as set forth in Count
18 One and hereby incorporated by reference, on or about the dates
19 specified therein.

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1 COUNT FIFTEEN

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about November 3, 2005, in Los Angeles County, within
4 the Central District of California, defendant JORGE VIRAMONTES,
5 also known as "Solo," knowingly and intentionally distributed at
6 least five grams, that is, approximately 18 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT SIXTEEN

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about January 19, 2006, in Los Angeles County, within
4 the Central District of California, defendant JUAN ALFRED
5 GONZALEZ, also known as "Negro," knowingly and intentionally
6 distributed at least five grams, that is, approximately eight
7 grams, of actual methamphetamine, a schedule II controlled
8 substance.

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1 COUNT SEVENTEEN
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about February 8, 2006, in Los Angeles County, within
4 the Central District of California, defendant DAVID TELLEZ
5 knowingly and intentionally distributed at least five grams, that
6 is, approximately 13.2 grams, of actual methamphetamine, a
7 schedule II controlled substance.

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1 COUNT EIGHTEEN

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about March 1, 2006, in Los Angeles County, within the
4 Central District of California, defendant DAVID TELLEZ knowingly
5 and intentionally distributed at least five grams, that is,
6 approximately 15.1 grams, of actual methamphetamine, a schedule
7 II controlled substance.

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1 COUNT NINETEEN

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about March 2, 2006, in Los Angeles County, within the
4 Central District of California, defendant DAVID PADILLA, also
5 known as "Lazy Dave," knowingly and intentionally distributed at
6 least five grams, that is, approximately 15.4 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT TWENTY

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about March 3, 2006, in Los Angeles County, within the
4 Central District of California, defendant DAVID PADILLA, also
5 known as "Lazy Dave," knowingly and intentionally distributed at
6 least five grams, that is, approximately 15.4 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT TWENTY-ONE

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about March 22, 2006, in Los Angeles County, within
4 the Central District of California, defendant DAVID TELLEZ
5 knowingly and intentionally distributed at least five grams, that
6 is, approximately 29.5 grams, of actual methamphetamine, a
7 schedule II controlled substance.

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1 COUNT TWENTY-TWO
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about March 23, 2006, in Los Angeles County, within
4 the Central District of California, defendant JUAN ALFRED
5 GONZALEZ, aka "Negro," knowingly and intentionally possessed with
6 the intent to distribute at least five grams, that is,
7 approximately 5.4 grams, of actual methamphetamine, a schedule II
8 controlled substance.

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1 COUNT TWENTY-THREE
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about May 5, 2006, in Los Angeles County, within the
4 Central District of California, defendant WILLIAM OWENS, also
5 known as "Target," knowingly and intentionally distributed at
6 least five grams, that is, approximately 23 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT TWENTY-FOUR
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about May 10, 2006, in Los Angeles County, within the
4 Central District of California, defendant DAVID TELLEZ knowingly
5 and intentionally distributed at least five grams, that is,
6 approximately 10.9 grams, of actual methamphetamine, a schedule
7 II controlled substance.

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1 COUNT TWENTY-FIVE
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about May 18, 2006, in Los Angeles County, within the
4 Central District of California, defendant RENATO GOMEZ knowingly
5 and intentionally distributed at least five grams, that is,
6 approximately 11.8 grams, of actual methamphetamine, a schedule
7 II controlled substance.

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1 COUNT TWENTY-SIX
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about May 24, 2006, in Los Angeles County, within the
4 Central District of California, defendants ANDRES RODRIGUEZ, also
5 known as ("aka") "Rascal," and DAVID EDWARD GIL, aka "L.A. Bull,"
6 knowingly and intentionally distributed at least five grams, that
7 is, approximately 11 grams, of actual methamphetamine, a schedule
8 II controlled substance.

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1 COUNT TWENTY-SEVEN
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about May 24, 2006, in Los Angeles County, within the
4 Central District of California, defendant RENATO GOMEZ knowingly
5 and intentionally distributed at least five grams, that is,
6 approximately 11 grams, of actual methamphetamine, a schedule II
7 controlled substance.

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1 COUNT TWENTY-EIGHT
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about May 31, 2006, in Los Angeles County, within the
4 Central District of California, defendant DAVID EDWARD GIL, also
5 known as "L.A. Bull," knowingly and intentionally distributed at
6 least five grams, that is, approximately 9.6 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT TWENTY-NINE
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about June 8, 2006, in Los Angeles County, within the
4 Central District of California, defendant DAVID EDWARD GIL, also
5 known as "L. A. Bull," knowingly and intentionally distributed at
6 least five grams, that is, approximately 26.1 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT THIRTY
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about July 18, 2006, in Los Angeles County, within the
4 Central District of California, defendant ANDRES RODRIGUEZ, also
5 known as "Rascal," knowingly and intentionally distributed at
6 least five grams, that is, approximately 23.8 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT THIRTY-ONE
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about July 19, 2006, in Los Angeles County, within the
4 Central District of California, defendant PETER SOTO, also known
5 as "Bouncer," knowingly and intentionally distributed at least
6 five grams, that is, approximately 9.6 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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